

SEALED

AO 91 (Rev. 11/11) Criminal Complaint

## UNITED STATES DISTRICT COURT

for the

Northern District of Texas

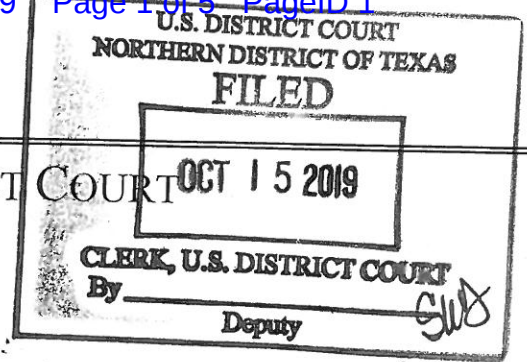
United States of America

v.

Christopher Andrew Reyes

Defendant(s)

Case No. 3:19-MJ-926-BN



## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of October 2, 2019 in the county of Dallas in the  
Northern District of Texas, the defendant(s) violated:

## Code Section

21 U.S.C. § 863(a)(3)  
21 U.S.C. § 846  
18 U.S.C. § 545  
18 U.S.C. § 371

## Offense Description

importation of drug paraphernalia  
conspiracy to violate the Controlled Substances Act  
smuggling of goods into the United States  
conspiracy to commit offense or to defraud the United States

This criminal complaint is based on these facts:

See the attached affidavit

☒ Continued on the attached sheet.

Complainant's signature

Chad Medaris

Printed name and title

Sworn to before me and signed in my presence.

Date:

10/15/19

Judge's signature

City and state: DALLAS, TEXAS

DAVID L. HORAN, MAGISTRATE JUDGE

Printed name and title

## AFFIDAVIT

I, Chad Medaris, a Special Agent with the United States Food and Drug Administration Office of Criminal Investigations, being duly sworn, depose and state:

1. I am a “federal law enforcement officer” within the meaning of Federal Rule of Criminal Procedure 41(a)(2)(C), that is, a government agent engaged in enforcing the criminal laws; and I am duly authorized by the Attorney General to request a search warrant. I have been a Special Agent with FDA-OCI for approximately six years. Prior to working for FDA-OCI, I was employed for approximately eight years as a Special Agent with the United States Office of Personnel Management-Office of the Inspector General. I have had formal training in healthcare fraud, medical device fraud, and counterfeit food and drug fraud and importation. I also have worked on several other investigations related to fraudulent food imports that were somewhat similar to the current investigation.

2. I am familiar with the facts and circumstances of the investigation set forth below through my personal participation; from discussions with other federal agents and law enforcement officers; and from my review of records and reports relating to the investigation. Because this affidavit is submitted for the limited purpose of securing a search warrant, I have not included details of every aspect of the investigation; rather only those facts necessary to establish probable cause.

3. This affidavit is made in support of a criminal complaint against **Christopher Andrew Reyes**, a Hispanic male, for a violation of 21 U.S.C. § 863(a)(3) (importation of drug paraphernalia), 21 U.S.C. § 846 (conspiracy to violate the

Controlled Substances Act), 18 U.S.C. § 545 (smuggling of goods into the United States), and 18 U.S.C. § 371 (conspiracy to commit offense or to defraud the United States), in the Northern District of Texas.

### FACTS

4. On September 21, 2019, Customs and Border Protection (CBP) intercepted a DHL shipment of 2,400 counterfeit items of THC vaping device parts bound for 5515 Squires Drive, The Colony, Texas 75056. Tetrahydrocannabinol (THC) is a Schedule I controlled substance. CBP records indicate that at least five other similar shipments likely containing vaping materials have reached the 5515 Squires Drive since September 13, 2019. The packages in question were addressed to “Chris Reyse” and sent from China, and transited through the Dallas-Fort Worth International Airport. The package bound for 5515 Squires Drive that agents inspected contained obvious drug paraphernalia intended for vaping THC and bore the counterfeit trademark of a popular THC vaping brand, “Cookies.”

5. On October 2, 2019, agents executed a search warrant at 5515 Squires Drive. During the search warrant execution, **Reyes** came to the property and voluntarily submitted to an interview by agents.

6. During that interview, **Reyes** admitted to his extensive involvement in illicit activity involving importing THC vaping materials from China. Specifically, **Reyes** stated that for approximately the last two months, he has been allowing associates who work at a vaping shop on Harry Hines Boulevard in Dallas to order THC vaping paraphernalia from China using **Reyes**’ bank card to be delivered to **Reyes**’ home. The



packages would then arrive at **Reyes**' home, and **Reyes** would transport the packages to his associates' vaping shop on Harry Hines Boulevard. **Reyes** stated that he was at least generally aware of the fact that the products he was taking to the vaping shop were counterfeit THC vaping materials. **Reyes** stated that his associates at the vaping shop would provide him with payment for the shipments that was several hundred dollars more than the cost of the shipments themselves, reflecting **Reyes**' profit for conducting this illicit activity.

7. **Reyes** voluntarily provided bank statements that generally supported the statements he made. Those bank statements reflect large orders from, for example, Alibaba—a large online Chinese seller similar to Amazon. They also reflect deposits being made to **Reyes**' account that are several hundred dollars larger than the orders for the illicit products, apparently reflecting **Reyes**' profits.

### CONCLUSION

Based on the above information, Affiant believes there is probable cause to believe that **Christopher Andrew Reyes**, a Hispanic male, committed a violation of 21 U.S.C. § 863(a)(3) (importation of drug paraphernalia), 21 U.S.C. § 846 (conspiracy to violate the Controlled Substances Act), 18 U.S.C. § 545 (smuggling of goods into the United States), and 18 U.S.C. § 371 (conspiracy to commit offense or to defraud the United States), in the Northern District of Texas.

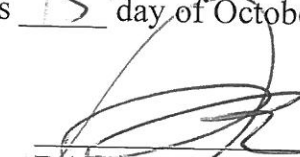
Therefore, Affiant requests that arrest warrants be issued for **Christopher Andrew Reyes**, a Hispanic male, for violations of 21 U.S.C. § 863(a)(3) (importation of drug paraphernalia), 21 U.S.C. § 846 (conspiracy to violate the Controlled Substances

Act), 18 U.S.C. § 545 (smuggling of goods into the United States), and 18 U.S.C. § 371 (conspiracy to commit offense or to defraud the United States), in the Northern District of Texas.



Chad Medaris, Special Agent  
FDA Office of Criminal Investigations

Subscribed and sworn to before me this 15<sup>th</sup> day of October 2019.



DAVID L. HORAN  
UNITED STATES MAGISTRATE JUDGE